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May 26, 2011

Kim A. Nguyen
Federal Energy Regulatory Commission
Office of Energy Projects
888 First Street, N.E.
Washington, D.C. 20426

Subject: Wells Hydroelectric Project Draft Environmental Impact Statement (DEIS)
EPA Project Number: 11-013-DOE

Dear Ms. Nguyen:

The U.S. Environmental Protection Agency has reviewed the DEIS for the relicensing of the Wells hydroelectric dam located on the Columbia River in Douglas, Okanogan, and Chelan counties, Washington. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

The DEIS evaluates four alternatives for the Public Utility District No. 1 of Douglas County (Douglas PUD) application for a new license to operate and maintain the 774.3-megawatt Wells Hydroelectric Project. The alternatives include: Alternative 1- no action, Alternative 2- Douglas PUD proposal, Alternative 3- Preferred Alternative (Douglas PUD with staff's additions and modifications), and Alternative 4- Staff alternative including all mandatory conditions. The DEIS identified the following primary issues related to aquatic species: protecting anadromous fish habitat, ensuring that spill operations minimize project contributions to elevated total dissolved gas levels in the Columbia River, improving passage for bull trout and Pacific lamprey, minimizing take of bull trout, and enhancing white sturgeon populations.

EPA supports the Preferred Alternative (Alternative 3), which includes environmental measures such as implementing a water quality plan; management plans for bull trout, pacific lamprey and white sturgeon; and, continuing to carry out the 2002 Well's Habitat Conservation Plan (HCP) agreement. We appreciate all of the background information available on Douglas County's website for this project including, the biological opinion, 2008 aquatic settlement agreement, HCP agreement, study plan determination, and pre EIS licensing applications.

From our review, we are rating the DEIS I.O, Lack of Objections (See attachment 1 for an explanation of our rating system). We believe if Douglas PUD adheres to the HCP as outlined by NOAA¹ and continues to coordinate with relevant agencies, Tribes and stakeholders, that this project should support the management goals and promote Upper Columbia River recovery efforts for spring Chinook and steelhead.

We acknowledge that the HCP and management of the dam require long-term adaptive management. We encourage FERC and Douglas PUD to utilize monitoring data to amend the aquatic management plans when necessary to ensure protection and restoration of resident and anadromous fish species.

Thank you for this opportunity to provide comments on the DEIS. If you would like to discuss these issues, please contact Lynne McWhorter at (206) 553-0205 or by email at mcwhorter.lynne@epa.gov.

Sincerely,


Christine Reichgott, Unit Manager
NEPA Review Unit

¹ NOAA. *Letter to FERC from NMFS*. 2007.

http://relicensing.douglaspud.org/background/hcp/2007_09_17_01.pdf.

